



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

April 10, 2023

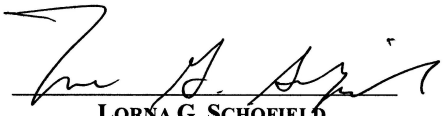
BY ECF AND EMAIL

The Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

Application **GRANTED**. The renewed petition shall be briefed in accordance with the schedule proposed below. The Clerk of the Court is directed to terminate the letter motion at docket number 228 in 06 Cr. 484 (LGS)

Dated: April 11, 2023
New York, New York

Re: **United States v. Joel Reyes German**,
06 Cr. 484 (LGS)
22 Civ. 7409 (LGS)


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Dear Judge Schofield:

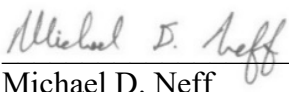
Last month, petitioner Joel Reyes German filed a counseled *pro se* successive motion, pursuant to 28 U.S.C. § 2255 (Dkts. 226, 227 (the “Motion”)), seeking to vacate his 18 U.S.C. § 924(c) conviction. The Government respectfully submits this letter, with the consent of petitioner’s counsel, to request a two-week extension of the Government’s deadline to submit its response to the Motion, which is currently due April 14, 2023. If granted, the resulting briefing schedule would be:

- Government’s response due **April 28, 2023**; and
- Petitioner’s reply due **May 19, 2023**.

This is the Government’s first request for an extension. On behalf of petitioner, his counsel, Brendan F. Quigley, Esq., has consented to this request.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By: 
Michael D. Neff
Assistant United States Attorney
(212) 637-2107

cc: Brendan F. Quigley, Esq. (by ECF and email)